



John J. McDermott jmcdermott@archerlaw.com 856.673.3902

March 13, 2020

## Via CM/ECF

Clerk of Court United States District Court District of New Jersey Martin Luther King Building & U.S. Courthouse 50 Walnut Street Newark, NJ 07101

Re: Occidental Chemical Corp. v. 21st Century Fox Am., Inc., et al.

Civil Action No. 2:18-cv-11273-MCA-JAD

## Dear Sir/Madam:

This firm represents Plaintiff Occidental Chemical Corporation (OxyChem) in the above-captioned matter. Pursuant to Local Rule 7.1(d)(5), OxyChem respectfully requests an automatic extension of time to file its opposition to Defendants' Motion for Partial Summary Judgment on OxyChem's Successor Liability [Dkt. Nos. 949, 950, 951]. Presently, the return date for Defendants' motion is April 6, 2020 and OxyChem's opposition is due on March 23, 2020. The originally noticed motion day has not previously been extended or adjourned.

Application of the automatic extension provided for in Local Rule 7.1(d)(5) will result in a new return date of April 20, 2020 and OxyChem's opposition will be due on April 6, 2020. Defendants' reply in support of the motion will be due on April 13, 2020.

Thank you for your consideration of this request.

Respectfully submitted,

Kathy D. Patrick

## Case 2:18-cv-11273-MCA-JAD Document 953 Filed 03/13/20 Page 2 of 2 PageID: 23090

Clerk of Court United States District Court – District of New Jersey March 13, 2020 Page 2

/s/ John J. McDermott

John J. McDermott

cc: All Counsel of Record (via CM/ECF)

218151766v1